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February 11, 2014

Ms. Janet LaBella, Director
Office of Program Performance
Legal Services Corporation
3333 K Street, N.W., 3rd Floor
Washington, D.C. 20007-3522

RE: Draft Report for Program Quality Visit to Prairie State Legal Services, Inc.

Dear Ms. LaBella:

Thank you for the Draft Report from the Program Quality Visit that LSC conducted at our Program during October 2013. We are grateful for the work of the highly-experienced and dynamic team that visited us, and the extensive evaluation and recommendations set out in the draft report. Our staff members enjoyed meeting with the team members and getting the benefit of their experience and ideas during the October visit. The visit was energizing for our Program. It came at an opportune time, dovetailing with our recent strategic planning process. Many of the recommendations noted in the draft report were identified and selected as strategic priorities by our Board of Directors and staff members in the 10-month-long strategic planning process we undertook prior to the LSC visit. Work is underway on these recommendations, and we look forward to reporting our progress in the future. We highlight just a few comments on the draft report below.

The LSC team identified several areas in which PSLS should consider devoting dollars to develop additional organizational administration. Like many non-profit organizations, we have focused our spending on direct client services. This focus is driven by our mission and, to a certain extent, has been important for our many funding sources. As a result of this focus, however, our administrative structure supporting direct services may be stretched too thin. This is an area we have begun to review and change; our funding and service delivery have become increasingly more complex, but our administrative support services have been largely unchanged from a time when we had far fewer direct service staff members and the technologies we relied on were less complicated and numerous.

The LSC Team recommended priority-setting among the strategic goals the organization has set, and involving staff members more broadly in implementation. We recognize that the strategic plan PSLS adopted in October 2013 is highly-ambitious and we agree that inclusion of additional staff members in the implementation of the plan is critical to success. The team suggested an initial focus on the role of managing attorneys. We agree.

The managing attorneys who oversee each of our 11 branch offices have many responsibilities, including supervising the local staff, coordinating with social service agencies and the local bar, coordinating with local funders and engaging in local fundraising activities, managing the local office budget, supervising the administration of litigation and client trust accounts, handling personnel issues, handling their own caseloads, and many other responsibilities. We ask a lot from the managing attorneys and we need to re-think how these functions are performed to maximize the effective use of managing attorneys' time. This evaluation will be a focus of our attention in the coming year.

Our ability to respond to the growing non-English-speaking population has not kept pace with the increase in population. While the team found PSLS has sufficient numbers of bilingual staff members, we need to provide more program-wide administrative support to coordinate our LEP efforts and undertake continuing assessment of our efforts. This again, dovetails back the question of how much time we expect to go into the direct provision of legal services rather than the administrative support for analyzing the effectiveness of our strategies and implementing training and objectives to improve such services. Our immediate response has been to form a staff committee to examine our LEP efforts, and we are in the process of determining who will become our new LEP Coordinator in light of the impending retirement of the current person filling this position.

The draft report also suggests that we expand our use of technology, including expanding our telephone system to include all of our offices. We implemented our current multi-office telephone system several years ago, but have been unable to include some of our more rural offices due to the costs involved. With costs of such services decreasing, the team's recommendation will be more feasible in the coming year. The team also suggested we expand our use of video conferencing and some knowledge management systems. This is an important goal, particularly for an organization that is spread over more than 22,000 square miles. More immediately, we have purchased brief bank capability from Westlaw and, with the transition to a single-server network, the brief bank will be available to all staff members working from offices or in remote locations.

Several of the draft report recommendations relate to enhancing our volunteer lawyer services. The draft report notes that, although Prairie State closed approximately 78% more *pro bono* cases per 10,000 poor persons than the national average, our program has the potential for substantial growth. We are fortunate to have many community attorneys who are committed to volunteering their time and using their unique legal skills to help people in need. We know in some areas we are underutilizing this vast resource and look forward to working with the private bar, judges, and corporate law departments to look at ways to expand volunteer services. Until recently, we relied on our branch office staff members to coordinate our PAI efforts, with several staff members performing these tasks on a part-time basis only. We recognized the need for a full-time experienced attorney to direct our volunteer services. Through a special grant from the Lawyers Trust Fund of Illinois, we created a new volunteer director position in mid-2013, and hired a highly-qualified managing attorney from within the organization to fill the role. She has now transitioned to her new duties, and is working on many of the recommendations from the LSC team to increase legal services for low-income persons via the volunteer efforts of private, corporate, and retired attorneys as well as students in our service area. As recommended by the team, she is developing a work plan for building on our existing PAI efforts; she is engaging the managing attorneys and project directors to encourage increased integration of *pro bono* work into the larger work of the program; she has taken responsibility for conducting the meetings and conference calls held by PAI staff members; she is the point person on PAI matters; and she is developing contacts with other national and statewide resources to support our *pro bono* development.

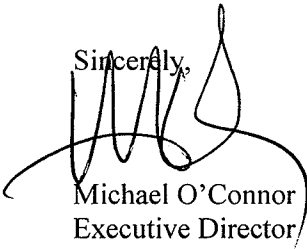
We appreciate the LSC's team recognition of our high-quality legal work and exceptional staff members. We agree that planning for the next generation of legal services leaders within Prairie State is important.

We do need to tighten our policies related to succession planning and to build more opportunities for our staff members to develop their leadership skills.

We would like to highlight one aspect of our services that we may not have made clear to the team during the visit. The draft report mentions that we are beginning to serve veterans. In fact, assisting veterans is already a significant part of our services. In 2012, we closed 897 cases for veterans; in 2013, we closed 1,282 cases for veterans. These cases run the range of our services, and have included, for example, saving several veterans' homes from foreclosure. In the past few years, we have targeted special outreach efforts to veterans. In mid-2011, we started a VISTA project to conduct this education and outreach, initially focusing in our Rockford service area, and expanding to most of our northern counties. The next phase of this project is to launch a veterans' legal clinic with a veterans' hospital in our Waukegan service area.

The LSC Program Quality Visit, like our strategic plan, presents us with many important objectives. The challenge remains in selecting where to start. We are pleased that the team found that we have a very solid foundation, excellent staff members, important service priorities, good financial controls, a diverse funding base, and services that exceed the national averages for our peer legal services organizations. We feel confident that the recommendations will help us as we continue to improve our services for the future.

Sincerely,



Michael O'Connor
Executive Director